

Corp.

Re: Gugliel SO CAREVE Richter

Richard M. Berman, U.S.D.J.

Dear Judge Berman:

This firm represents defendant Richter + Ratner Contracting Corp. We write to request an extension of time to complete fact discovery, for two weeks past the present February 14 cutoff date. The Court granted an extension we requested by letter dated December 18, 2007. The reason for this second request is that I find today that my partner Randi May, who is in the middle of preparing responses to plaintiff's interrogatories, requests to admit and requests for documents, is leaving on maternity leave some weeks earlier than anticipated, and I am leaving for eight days of vacation tomorrow. I will pick this project up from Ms. May as soon as I return and will get the responses to our adversary by February 28. I have spoken to our adversary and he does not object to the extension. If the status conference were held on the fourth succeeding business day, it would be on March 5.

Respectfully submitted,

Laura B. Hoguet LH 7485

Cc: Zeynal Karcioglu, Esq.